

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

NING BAO, XIONG CHEN, WEIHAO
WANG, LIFENG ZHANG, YINGDONG
LIN, CHENGHE WANG, CHANGFENG
ZHENG, BOHONG WANG, HANCHONG
NI, RENGUI GE, LIGEN HE, YONGMING
XU, LIANGYU HONG, BOSHENG WAN,
JIMING ZHONG, XIHUA PENG WAN,
BOXIONG WAN, BAOLIANG ZHANG,
BINGHUI ZHENG a/k/a Brycen Zheng
YANZHAO ZHAO, XIAOMEI XUE,
CHANGRONG CHENG, SHENGYUAN NI,
SHENJIE GAO, ANYANG SONG, ZHEN
LIN DUAN, YUAN YUAN CHEN a/k/a
Sammie Chen, MING SHAN CHIU, and
TROY LAW PLLC

Plaintiffs,

v.

YOUNGJIN KIM a/k/a Stanley Kim and
WOOYOUNG CHOI,

Defendants.

Adversary Proceeding #: 21-01289-SLM

**ANSWER AND
AFFIRMATIVE DEFENSES
DEMAND FOR JURY TRIAL**

Defendant, Wooyoung Choi, by way of answer to the Adversary Complaint Objecting to Dischargeability of Debt ("Complaint"), states as follows:

1. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.
2. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.
3. Defendant admits the allegations set forth in this paragraph.
4. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

5. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.

6. Defendant denies the allegations set forth in this paragraph.

7. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

8. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

9. Defendant denies the allegations set forth in this paragraph.

10. Defendant denies the allegations set forth in this paragraph.

11. Defendant denies the allegations set forth in this paragraph.

12. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.

13. Defendant denies the allegations set forth in this paragraph.

14. Defendant denies the allegations set forth in this paragraph.

15. Defendant denies the allegations set forth in this paragraph.

JURISDICTION AND VENUE

1. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.

2. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.

3. Defendant admits the allegations set forth in this paragraph.

PARTIES

Plaintiffs

4. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

5. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

6. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

7. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

8. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

9. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

10. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

11. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

12. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

13. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

14. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

15. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

16. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

17. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

18. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

19. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

20. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

21. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

22. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

23. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

24. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

25. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

26. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

27. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

28. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

29. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

30. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

31. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

32. Defendant denies the allegations set forth in this paragraph.

Defendants

33. Defendant admits the allegations set forth in this paragraph.

34. Defendant denies the allegations set forth in this paragraph.

35. Defendant denies the allegations set forth in this paragraph.

FACTUAL BACKGROUND

36. Defendant denies the allegations set forth in this paragraph.

37. Defendant denies the allegations set forth in this paragraph.

38. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

39. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

40. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

41. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

42. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

43. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

44. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

45. Defendant denies the allegations set forth in this paragraph.

46. Defendant denies the allegations set forth in this paragraph.

47. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

48. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

49. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

50. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

51. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

52. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

53. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

54. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

55. Defendant denies the allegations set forth in this paragraph.

56. Defendant denies the allegations set forth in this paragraph.

57. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

58. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

59. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

60. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

61. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

62. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

63. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

64. Defendant denies the allegations set forth in this paragraph.

65. Defendant denies the allegations set forth in this paragraph.

66. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

67. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

68. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

69. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

70. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

71. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

72. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

73. Defendant denies the allegations set forth in this paragraph.

74. Defendant denies the allegations set forth in this paragraph.

75. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

76. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

77. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

78. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

79. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

80. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

81. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

82. Defendant denies the allegations set forth in this paragraph.

83. Defendant denies the allegations set forth in this paragraph.

84. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

85. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

86. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

87. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

88. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

89. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

90. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

91. Defendant denies the allegations set forth in this paragraph.

92. Defendant denies the allegations set forth in this paragraph.

93. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

94. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

95. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

96. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

97. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

98. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

99. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

100. Defendant denies the allegations set forth in this paragraph.

101. Defendant denies the allegations set forth in this paragraph.

102. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

103. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

104. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

105. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

106. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

107. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

108. Defendant denies the allegations set forth in this paragraph.

109. Defendant denies the allegations set forth in this paragraph.

110. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

111. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

112. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

113. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

114. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

115. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

116. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

117. Defendant denies the allegations set forth in this paragraph.

118. Defendant denies the allegations set forth in this paragraph.

119. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

120. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

121. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

122. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

123. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

124. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

125. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

126. Defendant denies the allegations set forth in this paragraph.

127. Defendant denies the allegations set forth in this paragraph.

128. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

129. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

130. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

131. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

132. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

133. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

134. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

135. Defendant denies the allegations set forth in this paragraph.

136. Defendant denies the allegations set forth in this paragraph.

137. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

138. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

139. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

140. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

141. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

142. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

143. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

144. Defendant denies the allegations set forth in this paragraph.

145. Defendant denies the allegations set forth in this paragraph.

146. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

147. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

148. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

149. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

150. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

151. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

152. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

153. Defendant denies the allegations set forth in this paragraph.

154. Defendant denies the allegations set forth in this paragraph.

155. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

156. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

157. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

158. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

159. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

160. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

161. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

162. Defendant denies the allegations set forth in this paragraph.

163. Defendant denies the allegations set forth in this paragraph.

164. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

165. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

166. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

167. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

168. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

169. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

170. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

171. Defendant denies the allegations set forth in this paragraph.

172. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

173. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

174. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

175. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

176. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

177. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

178. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

179. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

180. Defendant denies the allegations set forth in this paragraph.

181. Defendant denies the allegations set forth in this paragraph.

182. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

183. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

184. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

185. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

186. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

187. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

188. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

189. Defendant denies the allegations set forth in this paragraph.

190. Defendant denies the allegations set forth in this paragraph.

191. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

192. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

193. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

194. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

195. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

196. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

197. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

198. Defendant denies the allegations set forth in this paragraph.

199. Defendant denies the allegations set forth in this paragraph.

200. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

201. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

202. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

203. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

204. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

205. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

206. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

207. Defendant denies the allegations set forth in this paragraph.

208. This paragraph does not contain any allegations to which Defendant may answer.

209. Defendant denies the allegations set forth in this paragraph.

210. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

211. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

212. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

213. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

214. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

215. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

216. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

217. Defendant denies the allegations set forth in this paragraph.

218. This paragraph does not contain any allegations to which Defendant may answer.

219. Defendant denies the allegations set forth in this paragraph.

220. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

221. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

222. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

223. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

224. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

225. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

226. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

227. Defendant denies the allegations set forth in this paragraph.

228. Defendant denies the allegations set forth in this paragraph.

229. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

230. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

231. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

232. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

233. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

234. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

235. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

236. Defendant denies the allegations set forth in this paragraph.

237. Defendant denies the allegations set forth in this paragraph.

238. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

239. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

240. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

241. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

242. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

243. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

244. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

245. Defendant denies the allegations set forth in this paragraph.

246. Defendant denies the allegations set forth in this paragraph.

247. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

248. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

249. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

250. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

251. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

252. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

253. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

254. Defendant denies the allegations set forth in this paragraph.

255. Defendant denies the allegations set forth in this paragraph.

256. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

257. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

258. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

259. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

260. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

261. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

262. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

263. Defendant denies the allegations set forth in this paragraph.

264. Defendant denies the allegations set forth in this paragraph.

265. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

266. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

267. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

268. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

269. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

270. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

271. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

272. Defendant denies the allegations set forth in this paragraph.

273. Defendant denies the allegations set forth in this paragraph.

274. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

275. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

276. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

277. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

278. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

279. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

280. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

281. Defendant denies the allegations set forth in this paragraph.

282. Defendant denies the allegations set forth in this paragraph.

283. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

284. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

285. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

286. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

287. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

288. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

289. Defendant denies information and knowledge sufficient to form a belief as to the truth of the matter alleged in this paragraph.

290. Defendant denies the allegations set forth in this paragraph.

291. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.

292. Defendant denies the allegations set forth in this paragraph.

293. Defendant denies the allegations set forth in this paragraph.

294. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.

295. Defendant denies the allegations set forth in this paragraph.

FIRST CAUSE OF ACTION

(NON-DISCHARGEABILITY OF DEBTS PURSUANT TO 11 U.S.C. § 523(a)(2)(A) for FALSE PRETENSES, A FALSE REPRESENTATION, OR ACTUAL FRAUD)

296. Defendant incorporates and repeats his responses to paragraphs 1 through 295 of this Answer.

297. Defendant admits that Plaintiffs accurately restate the text of the statute. Except as expressly admitted, Defendant denies the allegations in this paragraph.

298. Defendant denies the allegations set forth in this paragraph.

299. Defendant denies the allegations set forth in this paragraph.

300. Defendant denies the allegations set forth in this paragraph.

SECOND CAUSE OF ACTION

(NON-DISCHARGEABILITY OF DEBTS PURSUANT TO 11 U.S.C. § 523(a)(6) for WILLFUL AND MALICIOUS INJURY BY DEBTORS TO PLAINTIFFS)

301. Defendant incorporates and repeats his responses to paragraphs 1 through 295 of this Answer.

302. Defendant admits that Plaintiffs accurately restate the text of the statute. Except as expressly admitted, Defendant denies the allegations in this paragraph.

303. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.

304. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.

305. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.

306. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.

307. The allegations set forth in this paragraph is a legal conclusion to which no response is required. To the extent a response is required, Defendant denies them.

THIRD CAUSE OF ACTION

**(NON-DISCHARGEABILITY OF DEBTS PURSUANT TO 11 U.S.C. § 727(a)(4)(A) for
FALSE OATH OR ACCOUNT)**

308. Defendant incorporates and repeats his responses to paragraphs 1 through 295 of this Answer and admits that Plaintiffs accurately restate the text of the statute. Except as expressly admitted, Defendant denies the allegations in this paragraph.

309. Defendant states that the document(s) referenced in the allegations set forth in this paragraph speaks for themselves. To the extent a response is required, Defendant admits that Defendant signed his petition voluntarily and under penalty of perjury.

310. Defendant states that the document(s) referenced in the allegations set forth in this paragraph speaks for themselves. To the extent a response is required, Defendant admits the allegations in this paragraph.

311. Defendant denies the allegations set forth in this paragraph.

312. Defendant admits the allegations set forth in this paragraph.

313. Defendant denies the allegations set forth in this paragraph.

314. Defendant denies the allegations set forth in this paragraph.

315. Defendant denies the allegations set forth in this paragraph.

316. Defendant denies the allegations set forth in this paragraph.

FIRST AFFIRMATIVE DEFENSE

The Complaint fails to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

The Complaint fails to establish grounds for a denial of a discharge or for the dischargeability.

THIRD AFFIRMATIVE DEFENSE

Plaintiff(s) have no standing and/or capacity to bring this action.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs fail to assert facts in support of elements of claims asserted in the first cause of action.

FIFTH AFFIRMATIVE DEFENSE

There is no ascertainable damage, harm, and/or loss sustained by Plaintiffs.

SIXTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, because they are not "employees" under FLSA, or the New York State Labor and Wage/Hour Laws.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims fail to set forth allegations with particularity and specificity as required by Fed. R. Bankr. P. 7009 and Fed. R. Civ. P. 9

EIGHTH AFFIRMATIVE DEFENSE

The Complaint is barred, in whole or in part, based upon Plaintiffs' fraudulent representations concerning the alleged hours worked, and other fraudulent identification of facts.

NINTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in whole or in part because the work they alleged to have been unpaid is not compensable work.

TENTH AFFIRMATIVE DEFENSE

Plaintiffs' alleged damages were caused by Plaintiffs' own actions and/or omissions, or unreasonable reliance.

ELEVENTH AFFIRMATIVE DEFENSE

Defendant was not Plaintiffs' employer.

TWELFTH AFFIRMATIVE DEFENSE

Defendant is not in a fiduciary relationship with Plaintiffs.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' damages, if any, are the result of the actions of other third parties over whom or which Defendant has no control.

FOURTEENTH AFFIRMATIVE DEFENSE

The Complaint was filed for the improper purposes of harassment and unnecessary increases in the cost of resolving the dispute.

FIFTEENTH AFFIRMATIVE DEFENSE

The Complaint was actuated by malice or reckless disregard of Defendant's rights.

SIXTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred in equity, including without limitation the doctrine of unclean hands.

SEVENTEENTH AFFIRMATIVE DEFENSE

Plaintiffs' right to seek the stated relief has not accrued.

EIGHTEENTH AFFIRMATIVE DEFENSE

Plaintiffs fail to assert facts in support of elements of claims asserted in the first cause of action.

NINETEENTH AFFIRMATIVE DEFENSE

Plaintiffs fail to assert facts in support of elements of claims asserted in the first cause of action.

RESERVATION AND NON-WAIVER

Defendant reserves and does not waive any additional defenses as may be revealed by information subsequently acquired in discovery or otherwise.

WHEREFORE, Defendant demands judgment against Plaintiffs:

- a. dismissing the complaint in its entirety and with prejudice;
- b. awarding them the costs and disbursements of this action; and
- c. granting it such other and further relief as the Court deems just and equitable.

Kim, Cho & Lim, LLC
Attorneys for Defendants

Dated: July 2, 2021

By: /s/ Joshua Lim
Joshua Lim, Esq.

DESIGNATION OF TRIAL COUNSEL

Joshua S. Lim, Esq., is hereby designated as trial counsel for Defendants.

Kim, Cho & Lim, LLC
Attorneys for Defendants

Dated: July 2, 2021

By: /s/ Joshua Lim
Joshua Lim, Esq.

JURY DEMAND

Defendant, Youngjin Kim hereby demands a Trial by jury as to all issues so triable.

Kim, Cho & Lim, LLC
Attorneys for Defendants

Dated: July 2, 2021

By: /s/ Joshua Lim
Joshua Lim, Esq.